National Charter School Resource Center

High Impact Monitoring Findings for Replication & Expansion/CMO Grantees

A Resource Guide for CSP CMO Grantees

U.S. Department of Education
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High Impact Monitoring Findings for Developer/Non-SEA Grantees
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Overvew of Monitoring Findings

This document summarizes key findings of CMO grantee performance based on longitudinal monitoring data, when available. The data shared below is based on a May 2021 annual report authored by WestEd. Updated monitoring data are presented for the Replication and Expansion grants that were monitored covering the time period of 2015–16 to 2019–20. These findings shed light on the process by which grantees ensure high-quality schools, support and monitor schools in using grant funds, and manage the Federal funds.

Indicators Fully Met by Most Grantees

Indicator #	Title	Ratio	Percentage
Indicator 1.1	Definition of a Charter School	50 of 57 grantees	88%
Indicator 1.4	Parent and Community Involvement	44 of 57 grantees	77%
Indicator 1.5	Informing and Providing Equal Access	33 of 57 grantees	58%
Indicator 2.1	Quality Replication and Expansion Schools	33 of 57 grantees	58%
Indicator 3.1	Federal Funds	55 of 57 grantees	96%
Indicator 3.4	Records Management/Compliance With Grant Conditions	38 of 57 grantees	66%

Indicators Not Fully Met by Most Grantees

Indicator #	Title	Ratio	Percentage
Indicator 1.2	Program Implementation	29 of 57 grantees	51%
Indictor 1.3	Management Plan Implementation	33 of 57 grantees	58%
Indicator 2.2	Assisting Educationally Disadvantaged Students	30 of 57 grantees	52%
Indicator 2.4	Performance Measurement Quality	39 of 57 grantees	69%
Indicator 3.2	Use of Funds	31 of 57 grantees	55%
Indicator 3.3	Fiscal Control and Fund Accounting Procedures	45 of 57 grantees	79%

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Indicators Fully Met by Most Grantees

Federal Definition of a Charter School (Indicator 1.1): 50 of 57 grantees (88%) were in compliance with the requirements of this indicator. Year after year, the vast majority of grantees were able to demonstrate that they funded schools that met the Federal definition of charter schools. Grantees were typically able to demonstrate that grant-funded schools met the Federal definition by providing charter contracts that addressed the required elements. In the six instances where a grantee did not comply with this indicator, there were four issues identified related to school lottery policies.

Parent and Community Involvement (Indicator 1.4): 44 of 57 grantees (77%) were in compliance with the requirements of this indicator. Although there were inherently few opportunities for parents to be involved in school planning of the educational program for this group of grantees and grant-funded schools, there were examples of involvement that influenced the operation of schools. This included using survey results to make decisions, having advisory or advocacy councils, and empowering parents to become school or community leaders.

Informing and Providing Equal Access (Indicator 1.5): 33 of 57 grantees (58%) were in compliance with the requirements of this indicator. All grantees provided active and passive communication and recruitment strategies to inform parents and the community about the schools. CSP-funded schools occasionally employed lottery preferences that exceeded the Federal nonregulatory guidance, because grantees already had firmly established education models that were being replicated or expanded. This indicator also reviewed grantees' efforts to implement their enrollment procedures. A common practice among CMO grantees was to give priority in the lottery to students who matriculated from another school in the grantee network or based on geographic regions.

Quality Replication and Expansion Schools (Indicator 2.1): 33 of 57 grantees (58%) were in compliance with the requirements of this indicator. Most of the CMO grantees monitored were data-driven organizations that regularly monitored student progress and organizational indicators to make changes, plan, and determine levels of support needed. Grantees provided data to determine whether historic achievement gaps were closing. Although it was too early to have data on the progress of all grant-funded schools, the CMO grantees have been able to demonstrate that processes were in place to monitor and support the ongoing quality of their growing school portfolios. Grantees could use additional support in making comparisons between groups in the grant-funded schools or across all network schools to ensure that they are accurately capturing achievement gaps and other progress measurements.

Evaluation Plan (Indicator 2.3): 30 of 57 grantees (53%) were in compliance with the requirements of this indicator. Grantees were expected to include evaluation plans in their grant application and to carry them out throughout the course of the grant. Although the majority of grantees were able to demonstrate that they had implemented their proposed evaluation plan, the quality of evaluation plans included in grant applications varied widely. This was likely due to the lack of guidance from CSP on the preferred nature of grant project evaluations. Grantees could use additional support to create and implement effective evaluations that help assess the impact of their grant project or a related component of their specific programming.

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Federal Funds (Indicator 3.1): 55 of 57 grantees (96%) were in compliance with the requirements of this indicator. The vast majority of grantees demonstrated that they took the necessary steps to ensure that all of their charter schools received their commensurate share of Federal formula funding, including Title Ia, Title IIa, and IDEA Part B funds.

Records Management/Compliance with Grant Conditions (Indicator 3.4): 38 of 57 grantees (66%) were in compliance with the requirements of this indicator. The majority of grantees maintained and retained their grant-related documents appropriately. All grantees stored their grant records primarily in electronic form and some maintained paper copies as well. Both forms of documents (paper and electronic) were secure with limited access and were retained for the required time period.

Indicators Not Fully Met by Most Grantees

Program Implementation (Indicator 1.2): 29 of 57 grantees (51%) were not in compliance with the requirements of this indicator. Grantees were able to demonstrate that each network's Central Office provided instructional, technological, and other supports as proposed and necessary to operate high-quality charter networks. However, sector-wide slow-downs in the pipeline of charter schools regularly impacted grantees' abilities to implement their educational programs as proposed. Common findings from this indicator highlighted that grantees were not regularly informing their Program Officers about the nature of the delays and changes.

Management Plan Implementation (Indicator 1.3): 33 of 57 grantees (58%) were not in compliance with the requirements of this indicator. Grantees largely demonstrated that they took the steps to perform the back-office finance functions and worked with the district or State as necessary to support their schools. However, grant-specific project management plans were not consistently implemented. Common findings were related to staff turnover and/or a lack of written policies.

Assisting Educationally Disadvantaged Students (Indicator 2.2): 30 of 57 grantees (52%) were not in compliance with the requirements of this indicator. Grant-funded schools tended to provide special education services in inclusive settings and used pull-out services, if necessary. Schools tended to provide support for all students through multi-tiered strategies or differentiated instruction. Common issues included serving students with disabilities at lower rates than surrounding schools, having an unsuccessful partnership with a local school district (i.e., the district did not want to participate), or not monitoring and reporting suspension data across all schools.

Performance Measurement Quality (Indicator 2.4): 39 of 57 grantees (69%) were not in compliance with the requirements of this indicator. Common areas of concern among grantees were related to inconsistent wording or measurement of performance measures overtime.

Use of Funds (Indicator 3.2): 31 of 57 grantees (55%) were not in compliance with the requirements of this indicator. Typically allowed uses of funds includes personnel, technology, instructional materials, professional development, and travel for professional development. Unallowable uses of funds identified through monitoring included food and beverages,

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fundraising activities, t-shirts and other personal goods, uniforms, and, in one instance, international travel. Also, up until the FY 2017 competition, grantees could spend 20 percent of their total grant award to oversee and manage the opening of new schools and the expansion of existing schools. Defining and tracking these funds posed challenges for many grantees. Only a small majority of grant applications submitted by monitored grantees contained specifics on the use of these funds and most grantees did not seem to know how to monitor this expense.

Fiscal Control and Fund Accounting Procedures (Indicator 3.3): 45 of 57 grantees (79%) were not in compliance with the requirements of this indicator. As a subset of fiscal control and fund accounting procedures, all grantees monitored, except one, complied with the standards for financial management practices. This included practices such as using electronic financial accounting systems with reporting functions that enabled grantees to control their budgets appropriately and adequately as well as utilizing financial reporting, budget controls, and accounting records practices that were supported by documentation. However, the vast majority of grantees still lacked written procedures for allowable uses of funds, disposition of assets, and/or competitive bidding and contracts.

Resources to Assist Grantees in Meeting Indicators

U.S. Department of Education Resources & Guidance

Part 200 – Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards
https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200

Disposition of Equipment and Supplies
https://manhattansg.sharepoint.com/:b:/s/FED029-NCSRC/EWVpitfRA9JIusXq8ItOt0EBkvoq9s06UGlakTxzzgZchQ?e=C67S1u

§200.334 Retention requirements for records
https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200

EDGAR
https://www.ecfr.gov/current/title-34/part-75

CSP Nonregulatory Guidance
https://www2.ed.gov/programs/charter/fy14cspnonregguidance.doc (see page 17 for lottery guidance)

Grants Training and Management Resources Online Grants Training Courses
https://www2.ed.gov/fund/grant/about/training-management.html

National Charter School Resource Center (NCSRC) Resources

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NCSRC Logic Model Toolkit
https://charterschoolcenter.ed.gov/publication/logic-model-toolkit-resource-current-and-prospective-grantees-charter-school-programs

SMART Objectives Toolkit (& Accompanying Webinar)
https://charterschoolcenter.ed.gov/publication/smart-objectives-toolkit and
https://charterschoolcenter.ed.gov/webinar/smart-approach-strategies-making-objectives-smart

What to Expect When Getting Monitored
https://charterschoolcenter.ed.gov/webinar/what-expect-when-getting-monitored

Ten Things We Learned from Monitoring
https://charterschoolcenter.ed.gov/webinar/ten-things-we-learned-monitoring

Administering Ed Grants (on fiscal accountability & internal controls)
https://charterschoolcenter.ed.gov/webinar/administering-ed-grants

Indirect Costs Decoded
https://charterschoolcenter.ed.gov/webinar/indirect-costs-decoded

Administering ED Grants
https://charterschoolcenter.ed.gov/webinar/administering-ed-grants

2021 PD Meeting Materials
https://app.socio.events/ODU1OQ/auth

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